

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ASSOCIATED RECOVERY, LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:15-cv-01723-AJT-JFA
)	
JOHN DOES 1-44,)	
)	
<i>Defendants in rem.</i>)	

**DEFENDANTS' MOTION TO SET ASIDE
DEFAULT JUDGMENTS REGARDING VGJ.COM AND YJX.COM AND
RETURN THOSE DOMAIN NAMES TO THEIR PRIOR OWNERS**

In rem Defendants VGJ.com and YJX.com, pursuant to Federal Rule of Civil Procedure 60(b), hereby request to set aside the Judgment entered on May 18, 2016 [ECF 43]. Pursuant to Local Civil Rule 7(E), Defendants' counsel called Plaintiff's counsel to meet and confer in good faith regarding this Motion, and had understood that as of July 15, Plaintiff consented to the motion to set aside entry of default judgment, but only opposed the return of the domain names to Mr. Huang and Ms. Lin. Defendants' counsel thereafter sent a draft consent order to Plaintiff on July 15, 2016. During a subsequent conversation with Plaintiff's counsel on July 18, however, Plaintiff's counsel informed Defendants' counsel that he was unable to obtain authorization from the client regarding any aspect of this Motion.

The basis for this motion is set forth more fully in the accompanying Memorandum in Support of Motion to Set Aside the Default Judgments Regarding VGJ.com and YJX.com and Return Those Domain Names to Their Prior Owners.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and set aside the Judgment entered on May 18, 2016, 2016 (ECF 43) with respect to the VGJ.com and

YJX.com domain names. Defendants further request that the Court further order Uniregistrar Corp., the current registrar of the VGJ.com and YJX.com domain names, to take all steps within its power to transfer the domain back to Huochun Huang and Chunmei Lin, respectively.

Dated: July 18, 2016

Respectfully submitted,

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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 18th day of July, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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Dated: July 18, 2016

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